

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IOWA PUBLIC EMPLOYEES' RETIREMENT
SYSTEM, *et al.*,

Plaintiffs,

vs.

BANK OF AMERICA CORPORATION, *et al.*,

Defendants.

Case No. 17-cv-6221 (KPF)

**[PROPOSED] STIPULATED ORDER REGARDING EXTENSION OF
TIME TO RESPOND TO REQUESTS FOR ADMISSION
AND CONTENTION INTERROGATORIES**

WHEREAS, the parties exchanged requests for admission and contention interrogatories pursuant to Rule 33.3(c) of the Local Civil Rules of the Southern District of New York on August 19, 2020, the deadline set forth in the operative scheduling order (Dkt. 298);

WHEREAS, the parties conferred and agreed that, given the pendency of depositions and third-party document discovery between now and the October 16, 2020 fact discovery deadline, the thirty (30) day period to respond pursuant to Rules 33(b)(2) and 36(a)(3) of the Federal Rules of Civil Procedure would be unduly burdensome;

WHEREAS, the parties agreed to jointly request to extend the deadline by which to respond to requests for admission and contention interrogatories to November 16, 2020;

NOW, THEREFORE, the parties jointly request that the Court order that the parties shall respond to requests for admission and contention interrogatories by November 16, 2020. All other dates set forth in the Court's Fourth Amended Civil Management Plan and Scheduling Order (Dkt. 298) will remain unchanged by this order.

DATED: August 27, 2020

/s/ Michael B. Eisenkraft

Michael B. Eisenkraft
Christopher Bateman
David O. Fisher (pro hac vice)
COHEN MILSTEIN SELLERS & TOLL
PLLC
88 Pine Street, 14th Floor
New York, New York 10005
Telephone: (212) 838-7797
Fax: (212) 838-7745
meisenkraft@cohenmilstein.com
cbateman@cohenmilstein.com
dfisher@cohenmilstein.com

Julie Goldsmith Reiser (pro hac vice)
Emmy L. Levens (pro hac vice)
Daniel McCuaig (pro hac vice)
Robert W. Cobbs
1100 New York Ave NW, Suite 500
Washington, DC 20005
Telephone: (202) 408-4600
Fax: (202) 408-4699
jreiser@cohenmilstein.com
elevens@cohenmilstein.com
dmccuaig@cohenmilstein.com
rcobbs@cohenmilstein.com

***Attorneys for Plaintiffs Iowa Public
Employees' Retirement System, Los
Angeles County Employees Retirement
Association, Orange County Employees
Retirement System, Sonoma County
Employees' Retirement Association, and
Torus Capital, LLC***

Peter Safirstein
SAFIRSTEIN METCALF LLP
350 Fifth Avenue, 59th Floor
New York, New York 10118
Telephone: (212) 201-2845
psafirstein@safirsteinmetcalf.com

Counsel for Torus Capital, LLC

/s/ Daniel L. Brockett

Daniel L. Brockett
Sascha N. Rand
Steig D. Olson
Deborah K. Brown
Daniel P. Mach
David LeRay
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010
Telephone: (212) 849-7000
danbrockett@quinnemanuel.com
sascharand@quinnemanuel.com
steigolson@quinnemanuel.com
deborahbrown@quinnemanuel.com
danielmach@quinnemanuel.com
davidleray@quinnemanuel.com

Jeremy D. Andersen (pro hac vice)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
865 South Figueroa Street, 10th Floor
Los Angeles, California 90017
Telephone: (213) 443-3000
jeremyandersen@quinnemanuel.com

***Attorneys for Plaintiffs Iowa Public
Employees' Retirement System, Los Angeles
County Employees Retirement Association,
Orange County Employees Retirement
System, Sonoma County Employees'
Retirement Association, and Torus Capital,
LLC***

/s/ Richard F. Schwed

Adam S. Hakki
Richard F. Schwed
SHEARMAN & STERLING LLP
599 Lexington Avenue
New York, NY 10022
Telephone: (212) 848-4000
ahakki@shearman.com
rschwed@shearman.com

Michael P. Mitchell
401 9th Street, N.W.
Washington, D.C. 20004
Telephone: (202) 508-8100
michael.mitchell@shearman.com

***Attorneys for Defendants Merrill Lynch,
Pierce, Fenner & Smith Incorporated,
Merrill Lynch L.P. Holdings, Inc., and
Merrill Lynch Professional Clearing Corp.***

/s/ Jason M. Hall

David G. Januszewski
Herbert S. Washer
Elai Katz
Jason M. Hall
Sheila C. Ramesh
Margaret A. Barone
CAHILL GORDON & REINDEL LLP
80 Pine Street
New York, NY 10005
Telephone: (212) 701-3000
djanuszewski@cahill.com
hwasher@cahill.com
ekatz@cahill.com
jhall@cahill.com
sramesh@cahill.com
mbarone@cahill.com

***Attorneys for Defendants Credit Suisse AG,
Credit Suisse Securities (USA) LLC, Credit
Suisse First Boston Next Fund, Inc., and
Credit Suisse Prime Securities Services
(USA) LLC***

/s/ Alexis Collins

David I. Gelfand (*pro hac vice*)
Alexis Collins (*pro hac vice*)
CLEARY GOTTLIEB STEEN &
HAMILTON LLP
2112 Pennsylvania Ave., NW
Washington, DC 20037
Telephone: (202) 974-1690
dgelfand@cgsh.com
alcollins@cgsh.com

Carmine D. Boccuzzi, Jr.
One Liberty Plaza
New York, NY 10006
Telephone: (212) 225-2508
cboccuzzi@cgsh.com

***Attorneys for Defendants EquiLend LLC,
EquiLend Europe Limited, and EquiLend
Holdings LLC***

/s/ Staci Yablon

Robert Y. Sperling
WINSTON & STRAWN LLP
35 West Wacker Drive
Chicago, IL 60601
Telephone: (312) 558-7941
rsperling@winston.com

George E. Mastoris
Staci Yablon
200 Park Avenue
New York, New York 10166-4193
Telephone: (212) 294-6700
gmastoris@winston.com
syablon@winston.com

Richard C. Pepperman, II
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
peppermanr@sullcrom.com

***Attorneys for Defendant Goldman Sachs &
Co. LLC***

/s/ Henry Liu

Robert D. Wick
Henry B. Liu
John S. Playforth
COVINGTON & BURLING LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001
Telephone: (202) 662-6000
rwick@cov.com
hliu@cov.com
jplayforth@cov.com

***Attorneys for Defendants J.P. Morgan
Chase Bank, N.A., J.P. Morgan Securities
LLC, J.P. Morgan Prime, Inc., and J.P.
Morgan Strategic Securities Lending Corp.***

/s/ Peter G. Wilson

Alan J. Brudner
KATTEN MUCHIN ROSENMAN LLP
575 Madison Avenue
New York, New York 10022-2585
Telephone: (212) 940-8800
alan.brudner@kattenlaw.com

David C. Bohan
Peter G. Wilson
Sarah K. Weber
525 West Monroe Street
Chicago, Illinois 60661-3693
Telephone: (312) 902-5200
david.bohan@kattenlaw.com
peter.wilson1@kattenlaw.com

***Attorneys for Defendants UBS AG, UBS
Americas Inc., UBS Securities LLC, and
UBS Financial Services Inc.***

/s/ Lauren M. Rosenberg

Daniel Slifkin
Michael A. Paskin
Damaris Hernández
Lauren M. Rosenberg
CRAVATH, SWAINE & MOORE LLP
Worldwide Plaza
825 Eighth Avenue
New York, NY 10019
Telephone: (212) 474-1000
dslifkin@cravath.com
mpaskin@cravath.com
dhernandez@cravath.com
lrosenberg@cravath.com

***Attorneys for Defendants Morgan Stanley &
Co. LLC, Prime Dealer Services Corp., and
Strategic Investments I, Inc.***

IT IS SO ORDERED.

DATED: _____

THE HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE
SOUTHERN DISTRICT OF NEW YORK